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October 8, 2010  
(PBW Project No. 1584)

VIA FEDERAL EXPRESS

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: September 2010 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including performance of BERA field and laboratory activities described in the BERA WP-SAP.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
  - Field measurements collected as part of BERA field activities performed in September are summarized on Tables 1 and 2 attached to this letter.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - Completion of laboratory analytical and testing activities as described in the BERA WP-SAP;



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- Submittal of the BERA 60-day deliverable, which will include a summary of field activities, laboratory analytical results, a data validation summary, and an associated data validation checklist;
  - Submittal of the Draft Preliminary Site Characterization Report (PSCR), which will include a description of BERA field activities and the complete set of BERA data; and
  - Initiate preparation of the Draft Baseline Ecological Risk Assessment (BERA) Report.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Although not required by the UAO, the Respondents listed above have been working with EPA on developing an Administrative Settlement Agreement and Order on Consent (AOC) for a Time-Critical Removal Action for tank removal activities at the former tank farm area at the Site. A draft of this AOC was issued by EPA on September 14, 2010 and received by Respondents on September 20, 2010. Respondents' proposed revisions to correct some typographical errors and to make conforming changes to the draft AOC were provided to EPA on September 24, 2010. Depending on the progress toward the finalization of this AOC, other actions, in addition to those described above, may be performed during the next two months.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Ray Merrell – Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP

**Table 1**  
**Gulfco BERA Field Sampling Parameters - Sediment**

Sample Area/Type	Sample ID	Date	pH	ORP (mV)	Temperature (°C)
Wetland Sediment/ Porewater	EWSED03PW	9/9/2010	7.48	14.0	28.0
	EWSED09PW	9/10/2010	7.48	212.9	28.6
	EWSED04PW	9/13/2010	7.19	81.1	28.6
Note: Data collected prior to disturbance of location for sampling. The data listed for the pore water samples is not from the extracted pore water, but the sediment prior to collection and extraction.					

**Table 2**  
**Gulfco BERA Field Sampling Parameters - Water**

Sample Area/Type	Sample ID	Date	Water Depth (ft)	pH	Conductivity (mS)	Temperature (oC)	Salinity (ppt)	DO (mg/L)
Surface Water	EWSW03	9/14/2010	0.1	7.84	49.10	32.51	27.47	6.24
Marsh Porewater	EWSED03PW	9/9/2010	0.1	7.75	42.83	28.00	27.46	3.93
	EWSED09PW	9/10/2010	0.1	7.84	49.88	27.63	32.57	6.27
	EWSED04PW	9/13/2010	0.1	7.36	37.01	26.66	22.60	3.06
Note: Data collected prior to disturbance of location for sampling. The data listed for the pore water samples is not from the extracted pore water, but the overlying water prior to collection and extraction.								